## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

EVAN HAMMERMAN,	:	CIVIL ACTION	
	:		
Plaintiff	:		
	:		
V.	:	NO	
	:		
GB COLLECTS, LLC	•		
	:		
Defendant	:		

## **NOTICE OF REMOVAL**

Defendant GB COLLECTS, LLC ("Defendant" or "GBS"), by its undersigned counsel, hereby petitions this Court as follows, pursuant to 28 U.S.C. § 1441(b):

- GBS is a Defendant in an action pending in the District Court of Maryland for Montgomery County, Civil Case No. 060100079922013 ("the State Court Action"). A true and correct copy of the Complaint in the State Court Action is attached hereto as Exhibit "1."
- Plaintiff in the State Court Action is Evan Hammerman ("Plaintiff"). See Exhibit
  "1."
- Plaintiff's State Court Action alleges violations of the Fair Debt Collection
  Practices Act, 15 U.S.C. § 1692, et seq.
- 4. The State Court Action involves a question of federal law. Pursuant to 28 U.S.C. § 1331, "The district courts shall have original jurisdiction of all civil actions arising under the Constitution, laws, or treaties of the United States."
- 5. Pursuant to 28 U.S.C. § 1441(a), "[a]ny civil action brought in a State court of which the district courts of the United States have original jurisdiction, may be removed by the

## Case 8:13-cv-01606-DKC Document 1 Filed 06/04/13 Page 2 of 3

Defendant or the Defendants, to the district court of the United States for the district and division embracing the place where such action is pending."

- 6. Since this case arises out of an alleged violation of the Fair Debt Collection Practices Act, 15 U.S.C. § 1692, et seq., Defendant GBS may properly remove the State Court Action to this Court based on 28 U.S.C. § 1441(a).
- 7. This Notice has been filed with the Court within thirty (30) days after purported service of the Complaint on Defendant.

WHEREFORE, Defendant GB Collects, LLC, prays that the State Court Action be removed.

THE LAW OFFICES OF RONALD S. CANTER, LLC

Ronald S. Canter, Esquire

Bar No. 01024

200A Monroe Street, Suite 104

Rockville, Maryland 20850

Telephone: (301) 424-7490

Facsimile: (301) 424-7470

E-Mail: rcanter@roncanterllc.com

Attorney for Defendant

## **CERTIFICATE OF SERVICE**

The undersigned does hereby certify that a true and correct copy of the foregoing was served upon the individual(s) listed below by First Class Mail, postage prepaid on this 3rd day of June, 2013 to:

Evan Hammerman 13723 Lambertina Place Rockville, Maryland 20850 Pro Se Plaintiff

Ronald S. Canter, Esquire Attorney for Defendant